

EXHIBIT 2

Defendants' Categorical Privilege Log #2¹

| | <i>Date Range²</i> | <i>Document Type(s)</i> | <i>Sender(s), Recipient(s), Copyee(s)³</i> | <i>Category Description</i> | <i>Privilege⁴</i> |
|---|--------------------------------------|--|---|--|--|
| 1 | 10/4/13-8/19/19 | Emails and .pdf documents | Peter Grant, Esq., Robert De Niro, Chase Robinson, Josh Lieberman, Glen Meredith, Lawrence Shire, Esq., Megan Kelly, Peter Hess, Erin O'Brien, Gillian Spear, Sophie Kavanagh, Michael Tasch Stan Rosenfield, Tom Harvey, Esq. and Jane Rosenthal | Communications and documents involving transactional legal counsel for Canal Productions, Inc. ("Canal") and/or Robert De Niro, between and among Mr. De Niro, various Canal personnel and/or external consultants | Attorney-client communication; attorney work product |
| 2 | 4/6/19-8/16/19 | Emails, .pdf and word processing documents | Tom Harvey, Esq., Mr. De Niro, Mark Bosswick, Michael Tasch, John Hackett, Esq., Tiffany Chen, Michael J. Volpe, Esq., Laurent Drogin, Esq., Stan Rosenfield | Communications and documents exchanged between and among Canal's general legal counsel, its external legal counsel, Mr. De Niro, various former or current Canal personnel and/or external consultants and others | Attorney-client communication; attorney work product |
| 3 | 10/5/14-9/16/19 | Emails | John Hackett, Esq., Michael Kaplan, Chase Robinson, Nellie Norden, Mr. De Niro, Raphael De Niro, Tom Harvey, Esq., Michael Tasch, Jeff Wodicka, Sabrina Weeks-Brittan, Gillian Spear, Tiffany Chen, Stan Rosenfield and Jane Rosenthal | Communications and documents exchanged between and among Canal's general legal counsel, Chase Robinson, Mr. De Niro and various Canal personnel and/or external consultants or others | Attorney-client communication; attorney work product |

¹ Pursuant to the Stipulation and Order Regarding Production of Electronically Stored Information ("ESI") (Dkt. No. 29), this privilege log does not include (a) internal communications within Traub Lieberman Straus & Shrewsbury LLP ("TLSS"), (b) communications between TLSS and (i) Defendant Robert De Niro, (ii) Sabrina Weeks-Brittan, Gillian Spear, and Michael Kaplan if they remain Canal personnel, and/or (iii) Tom Harvey, Esq.; or (c) materials created by TLSS as part of the investigation or litigation of this case.

² The dates identified herein are based on the technical capabilities of the ESI platform in use.

³ Please note that this column of information encompasses communications that may only involve two of the identified individuals, depending on the particular communication. In other words, not every single communication identified herein involves all of the individuals specified in this column.

⁴ Defendants expressly reserve, and do not waive, all rights to modify and supplement the proffered privilege justifications offered herein.

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| 4 | 8/20/19-11/4/19 | Emails, .pdf and .png documents | Jane Rosenthal, Tom Harvey, Esq., Mr. De Niro, Tiffany Chen, Michael Tasch, Stan Rosenfield, Gillian Spear, Sabrina Weeks-Brittan, | Communications and documents exchanged between and among Canal's general counsel, Mr. De Niro, various former or current Canal personnel and/or external consultants and others relating to federal or state court actions | Attorney-client communication; attorney work product |
| 5 | 1/3/19-4/6/19 | Emails, .pdf and .png documents | Caroline Krauss-Browne, Esq., Chase Robinson, Mr. De Niro, Jennifer Lombardo, Esq., Sabrina Weeks-Brittan, Julian De Niro, Mark Bosswick, Michael Tasch, Tom Harvey, Esq. | Communications and documents exchanged between and among Mr. De Niro's family legal counsel and family members, various former or current Canal personnel and/or external consultants and others relating to family law matters | Attorney-client communication; attorney work product |